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PLAINTIFF,'S EXHIBITS

Exhibit A

Civil Action No.

Puruant to 28 U.S.C. section 1746 I, Roberto C. Grillo declare the following is true and correct under the penal of perjury.

- 1) I, Roberto C. Grillo SBI #609227-C Inmate #1195482 am housed on housing 2-Left cell #164 located at New Jersey State Prison.
- 2) Due to the extreme noise from large metal fans mounted on the walls on the unit and on the floor I have lost sleep at times up to two days in a row on many occasions throughout the year.
- 3) During the winter when temperatures are under 40° the heat is also turned off regularly, I don't have extra blanket and I am very cold.
- 4) When I told O.F.C. Z. Goodwin about the above conditions on January 25, 2021 while I was in my cell he said blame Durham for complaining.

Rob C. Grillo
February 1, 2021

Exhibit A-1

Civil Action No. _____

Declaration of Ewart M. Guillette

1. I, Ewart M. Guillette #128139E #98798 Confined at New Jersey State Prison, housed on 2 left #60.
2. On 3/20/2021, Approximately 8 AM OFC L. Jovanovic and OFC Z. Goodwin told me to step out of my cell, About 20 minutes later I returned and my property was ransacked and tossed about the cell, legal papers, stamps, pictures torn up in the toilet, when I inquired I was ignored and told it could of been worst by them.
3. On March 20, 2021 at Approximately 11:20 AM while in my cell I overheard O.F.C Z. Goodwin tell OFC L. Jovanovic say that I would be next to be strip searched ~~because~~ I am already on my black list for strip searches. Guillette needs to stop complaining about not getting his haircut and access to the kiosk. This was said while they were going in and out of the cell next to mine.

Exhibit A-2

4. Ofc L. Jovanovic said Durham complained to me about the fans on the wall and the large fans on the floor making too much noise and causing him to lose sleep and him not being able to come out and get fresh drinking water. I told him that's not my problem, Ofc 2. Goodwin started laughing.

5. Ofc 2 Goodwin said to me don't become a problem nigger like Durham, mind your business or we will trash your cell like Durham's and throw your legal work, pictures and other property away. Of course I read legal work before I throw it away in professional.

6. Ofc L. Jovanovic said don't these stupid black b*stards realize the people that run this administration don't care if you write us up they will always back us up, we have connections with administration. We have been written up numerous times already, Ofc L. Jovanovic started laughing.

03.21.2021
Crest

1. OFC L. JOVANOVIĆ SAID TO ME "KNOCK IT
OFF OR I WILL PUT YOU IN DOUBLE LOCK
SO YOU CAN BE RAPED"

Exhibit A-9

T.O.F.C L. Jovanovic said to me "Knock it off
or I will put you in double lock so you
can be raped."

Exhibit A-9
03.21.2021

[illegible]

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY.

Civil Action No.

DECLARATION OF ROBERTO GRILLO

Pursuant to 28 U.S.C. 1746 I declare under the penalty of perjury the following is true and correct.

- 1) I, Roberto Grillo #609227-C, state #1195482 am present confined at New Jersey State Prison on housing unit 2 left 164 cell.
- 2) On or about November 13, 2020 while I was in my cell I overheard O.F.C. L. Jovanovic tell another inmate "Durham has filed grievances and law suits on Co's so me and my partner Goodwin have him on our black list. No Kiosk, his cell gets trashed and legal papers thrown away, I don't care fuck that nigger."

Rob Grillo
11-24-2020

[illegible]

Exhibit A-5

Declaration: of Ewart M. Guillebe

pursuant to 28 USC § 1746, I Ewart M. Guillebe declare under the penalty of perjury that following is true and correct.

I, Ewart M. Guillebe am incarcerated at New Jersey State Prison. During April 2 last at 11:00.

① On March 17, 2021 ORE L Jovanovic while walking by my cell and said Durham has been complaining some last year about the cold and the heat being over 100 it cold.

② ORE J. ARMOUR was also nearby and said I really don't care is hot cold but the only one who always has something to say.

Dated: June 25, 2021

Correct your
Ewart M. Guillebe

DECLARATION OF: Roberto Grillo

Civil Action No. 1

Pursuant to 28 U.S.C. 1746 I Roberto Grillo declare under the penalty of perjury the following statement are true and correct.

- 1) I, Roberto Grillo SBI #609227-C, Inmate #1195482 am confined at New Jersey State Prison, P.O. Box 861, Trenton, NJ. 08625, I am housed on 2-left cell #164.
- 2) On December 4, 2020 I was using the Kiosk and on my way back to my cell #164 I saw c/o Goodwin in my cell next to my bed reading my legal mail.
- 3) I then walked away to avoid any confrontation, after a few minutes c/o Goodwin left my cell.
- 4) Upon entering my cell all of my commissary food was removed from it's storage box and now all over my bed, one of my rice bag was open and spilled on my bed. The legal mail that c/o Goodwin was reading was also mixed on my bed with my food.

Rob Grillo

December 11, 2020

Exhibit A-7

copy done

CIVIL ACTION No _____

Pursuant to 28 U.S.C. section 1746, I Hakeem Williams declare under the penalty of perjury the following is true and correct.

1. I, Hakeem Williams state # 1161946
SBI# 828877E am confined at New Jersey State Prison housed on unit 2 left 156 cell.

2. On March 6, 2021 approximately 8:30 a.m. I complied with a cell search by O.F.C. Z. Goodwin.

3. When I returned to my cell approximately 8:56 a.m. it was ransacked. My legal papers all over the cell and ripped up in the toilet bowl, my religious literature and books on the floor mixed with my food and clothes and other property.

4. I immediately requested to see a sergeant O.F.C. L. Jovanovic yelled at me "suck my dick nigger"!

↓ (turn over)

5.O.F.C. Z. Goodwin said "you are not special you get treated like the rest of our black monkeys".

6.I didnt provoke this treatment or the words said to me.

7.I am a black man.

X Hakeem Wilkins
X 3/18/2021

back

Civil Action No.

Pursuant to 28 U.S.C. 1746 I, Andre Mells declare the foregoing statements are true and correct under the penalty of perjury.

1. I, Andre Mells #452119C, #871359 am incarcerated at New Jersey State Prison, I am housed on 2 Left cell #62.
2. On Approximately September 4, 2020 while on 2 Left Sco. Z. Goodwin and Sco. Jovanovic denied me a shower by not opening my door this has not been the first time they have done this to me.
3. On Approximately September 4, 2020 I was denied access to the Jpay Kiosk. This has occurred on various other dates, while on 2 Left by the same Correctional Staff named above, they refused to open my door.
4. On Approximately October 8, 2020 my clearly marked legal mail was stolen by SCO. Z. Goodwin and SCO. L. Jovanovic. It was taken out of my cell #62 and never given back to me.
5. On Approximately October 8, 2020 contraband was placed in my cell #62 by the above officers; (Stinger).

6. On the above dates Sco. L. Jovanovic told me "Fuck you nigger" whenever I inquired about his actions.

Ucc1308 Andre Mells

October 18, 2020

Ref# NJSP21007358	Housing: NJSP-WEST-1 RIGHT-FLATS-CELL 05	Date Created: 03/01/2021
ID#: OS01613467	Name: DURHAM, TREMAYNE	
Form: Grievance	Subject: Administration	Description: Other
Urgent: No	Time left: n/a	Status: Closed

Original Form

3/1/2021 9:51:45 AM : (os01613467) wrote

In regard to NJSP21005441 I reiterate the same statement this is unacceptable incoming clearly marked legal mail should only be opened in my presence.

Communications / Case Actions

3/1/2021 9:51:45 AM : (os01613467) wrote

Form has been submitted

3/1/2021 11:59:06 AM : (FATHOM BORG) wrote

As you have already written regarding this issue on NJSP21006275 and it has yet to be responded to, this inquiry is a duplicate and will be closed. Please allow staff the appropriate time frame to respond to inquiries.

3/1/2021 11:59:10 AM : (FATHOM BORG) wrote

Closed incarcerated individual form

3/9/2021 5:11:34 PM : (os01613467) wrote

Case Appealed.

3/9/2021 5:11:34 PM : (os01613467) wrote

To clarify NJSP21005441 is not a duplicate is is distinct and deals with 2-9-2021 with my mail incoming clearly marked legal mail from the Circuit Court being opened not in my presence, it was handed to me on the unit by O.F.C. M. Doyle.

3/10/2021 9:51:11 AM : (Jonathan Gramp) wrote

Legal mail is opened in the presence of the recipient consistent with current policy.

3/10/2021 9:51:16 AM : (Jonathan Gramp) wrote

Closed appealed incarcerated individual form

Ref# NJSP21006275	Housing: NJSP-WEST-1 RIGHT-FLATS-CELL 05	Date Created: 02/21/2021
ID#: OS01613467	Name: DURHAM, TREMAYNE	
Form: Grievance	Subject: Mailroom	Description: Issue with Mail
Urgent: No	Time left: n/a	Status: Closed

Original Form

2/21/2021 8:20:36 AM : (os01613467) wrote

I reiterate NJSP21002762 inquiry was already sent and supervisor was unavailable when requested to deal with issue. This is unacceptable outgoing clearly marked legal mail was opened 11-10-20 and 11-23-20 the clearly marked legal mail was delivered opened with contents missing to the Ombudsman.

Communications / Case Actions

3/17/2021 9:12:14 AM : (Omar Mendoza) wrote

I spoke to staff and no one reports opening legal mail in the mailroom. There are procedures that need to be followed and paper-work to be completed in situations like this. There would be a record. I cannot help you with this allegation until I receive further information or evidence to support your allegation.

3/19/2021 5:31:56 PM : (os01613467) wrote

I reiterate NJSP21006272 this is unacceptable 11-10-20 outgoing clearly marked legal mail was opened not in my presence. On 11-23-20 clearly marked legal mail addressed to the Ombudsman was delivered opened to the Ombudsman opened with the contents missing, this was done not in my presence.

3/23/2021 1:44:36 PM : (Jonathan Gramp) wrote

To clarify, the mailroom does not open outgoing mail. This is not procedure or policy. Legal mail, when received, is opened in the presence of the recipient. Any mail forwarded to another agency and or unit is opened for inspection prior to delivery to that unit or agency at their respective mailroom. That does not fall under the legal mail protections provided to inmates under 10A for incoming legal mail.